

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEGAN VILLELLA, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CHEMICAL AND MINING COMPANY OF
CHILE, INC., et al.,

Defendants.

Civil Action No. 1:15-cv-02106-ER-GWG
(Consolidated)

CLASS ACTION

JOINT STIPULATION AND [PROPOSED]
SCHEDULING ORDER GOVERNING
SUMMARY JUDGMENT MOTIONS AND
DAUBERT MOTIONS

WHEREAS, on October 11, 2019, the parties appeared for a status conference and the Court set a deadline for the filing of dispositive motions, if any, 30 days after the deposition of third-party witness Wayne Brownlee;

WHEREAS, the deposition of Wayne Brownlee took place on February 25, 2020;

WHEREAS, both parties may file *Daubert* motions in addition to any motions for summary judgment, and respectfully request that the Court waive its pre-motion letter and conference requirements set forth in Section 2.A.ii of the Court's Individual Rules of Practice;

WHEREAS, the parties have conferred and agreed, pending the Court's approval, to a schedule governing briefing on summary judgment and accompanying *Daubert* motions as set forth below;

Accordingly, IT IS HEREBY STIPULATED AND AGREED by the parties, through their undersigned counsel, subject to Court approval, as follows:

EVENT	DEADLINE
Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	March 26, 2020
Oppositions to Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	May 29, 2020
Replies in Support of Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	July 13, 2020

The pre-motion letter and conference requirements set forth in Section 2.A.ii of the Court's Individual Rules of Practice are hereby waived regarding the parties' *Daubert* and summary judgment motions.

Each party reserves the right to seek an extension of the above deadlines.

Dated: March 11, 2020

ROBBINS GELLER RUDMAN
& DOWD LLP
AELISH M. BAIG
MATTHEW S. MELAMED
JOHN H. GEORGE
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: (415) 288-4545

Lead Counsel for Plaintiff

By: /s/ Matthew S. Melamed
MATTHEW S. MELAMED

MILBANK LLP
SCOTT A. EDELMAN
GRANT R. MAINLAND
ALISON BONELLI
55 Hudson Yards
New York, NY 10001
(212) 530-5000

*Attorneys for Defendant Chemical and Mining
Company of Chile, Inc.*

By: /s/ Grant R. Mainland
GRANT R. MAINLAND

SO ORDERED.

DATED: _____

HONORABLE EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE